

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA

Plaintiff,

Case Nos. 2:24-cv-13422
and 2:24-mc-50222

v.

Hon. Laurie J. Michelson

DAVID JANKOWSKI

Defendant,

and

STEPHEN JANKOWSKI, et. al.,

Petitioners.

**AMENDED STIPULATED AGREEMENT FOR ORDER ON
SHARE OF MAPLE GARDEN PROCEEDS**

This Stipulated Agreement for Order on the Maple Garden Apartment Proceeds is made and entered into by and between the Parties, Plaintiff, the United States of America, by and through the undersigned; and Petitioners, Maple Garden Associates, LLC, through its authorized representative, Stephen Jankowski, and Stephen Jankowski, individually, by and through counsel, the undersigned. The Parties do hereby agree and stipulate to the following:

WHEREAS, Petitioner, Maple Gardens Associates, LLC (“MGA”), is a limited liability corporation licensed to do business in the State of Michigan. Petitioner, Stephen Jankowski (“Stephen”), is an individual, and is the manager and authorized representative of MGA.

WHEREAS, in addition to the instant matter, the parties have been involved in litigation concerning the proceeds of an apartment building sold by MGA on or about May 8, 2023 (hereinafter referred to as the “MGA Proceeds”). *See United States v. Jankowski, et al.*, Case No. 2:24-cv-13422 and *United States v. Jankowski, et al.*, Case No. 2:17-cr-20401 01. Proceeds from the sale are currently held with the Clerk of the Court in an interest-bearing account. (*United States v. Jankowski, et al.*, Case No. 2:17-cr-20401, ECF No. 310).

WHEREAS, Stephen, Paula Jankowski, Alex Jankowski, and Jenna Jankowski petitioned the Court to release the MGA Proceeds, and on December 23, 2024, the Court held that Paula Jankowski, Alex Jankowski, and Jenna Jankowski held their interests in MGA as nominees and/or alter egos of the Defendant, David Jankowski; and therefore, were without any legal interest in MGA and denied their request for immediate release of the MGA Proceeds. (ECF No. 6 and 29).

WHEREAS, on June 4, 2025, the Court held that Stephen was entitled to twenty-five percent (25%) of the MGA Proceeds, less \$39,450.00, and ordered the United States to disburse said amount. (ECF No. 48). The parties agree Stephen’s MGA Share Proceeds amount is \$631,590.00.¹

WHEREAS, on June 18, 2025, the Court entered a Preliminary Order to continue the escrow of Stephen’s share of the MGA Proceeds (“MGA Share Proceeds”) (ECF No. 50).

¹ (\$2,684,161.00 * 0.25) - \$39,450.00 = \$631,590.00 (figures rounded to the nearest whole dollar).

WHEREAS, Stephen and MGA stipulate and agree that in consideration and receipt of **Four Hundred and Sixty Thousand Dollars and 00/100 (\$460,000.00)** from the previously identified MGA Share Proceeds, Stephen and MGA expressly agree to relinquish any and all claims as to the remaining balance of the MGA Proceeds, including the MGA Share Proceeds. Funds shall be disbursed by the Clerk of the Court forthwith. Wire instructions may be provided to the Clerk.

WHEREAS, the United States stipulates and agrees that in consideration and receipt of the remaining MGA Proceeds, including the MGA Share Proceeds, less Four Hundred and Sixty Thousand Dollars and 00/100 (\$460,000.00), the United States will agree to stipulate to dismiss Defendants MGA and Stephen from *United States v. Jankowski, et al.*, Case No. 2:24-cv-13422.

WHEREAS, by entering into this Stipulated Agreement, Stephen, on behalf of himself and on behalf of MGA affirms that he has read and discussed this agreement with his counsel and is aware of his and MGA's rights in this matter.

WHEREAS, the parties stipulate and agree that all parties shall bear their own costs and fees, including attorney fees, in this matter and Stephen and/or MGA shall be responsible for any and all tax ramifications related to Stephen's MGA Share Proceeds. Stephen further acknowledges that his attorney has not provided any tax information to him, and he has been advised to seek independent counsel for any tax implications of the distribution of his MGA Share Proceeds.

WHEREAS, Stephen acknowledges that MGA has an outstanding loan (number ending in 7905) with the Small Business Association ("SBA") and that he

has personally guaranteed this obligation. Nothing in this Stipulated Agreement shall be construed as modifying that debt and obligation owed by MGA, Stephen Jankowski, or any other co-obligor.

WHEREAS the parties agree that nothing in this order shall constitute or be treated as an admission by any party of any liability or wrongdoing, nor shall this order be admissible as evidence in any ancillary proceeding involving criminal restitution of the Defendant, David Jankowski.

WHEREAS, this Stipulation may be executed in two or more counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same agreement.

NOW THEREFORE, upon entry of the Stipulated Agreement for Order on Share of Maple Garden Proceeds, the Clerk of the Court shall disburse from case 2:17-CR-20401 **Four Hundred and Sixty Thousand Dollars and 00/100 (\$460,000.00)** from principal forthwith to:

Stephen Jankowski
c/o Rubin Frampton
600 S. Adams Rd., Ste. 300
Birmingham, MI 48009

Wire instructions may be provided to the Clerk.

IT IS FURTHER ORDERED that following entry of this order, the United States, Stephen Jankowski, and Maple Gardens Associates, LLC, shall file a stipulated dismissal of Stephen Jankowski, and Maple Gardens Associates, LLC, with prejudice in the matter of *United States v. Jankowski, et al.*, Case No. 2:24-cv-13422.

Upon stipulation by the parties, **IT IS SO ORDERED** this 16th day of July 2025.

Dated: July 17, 2025

s/Laurie J. Michelson
LAURIE J. MICHELSON
UNITED STATES DISTRICT JUDGE

AGREED AS TO FORM AND SUBSTANCE:

JEROME F. GORGON, JR.
United States Attorney

/s/ Peter F. Schneider
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Date: July 14, 2025

RUBIN FRAMPTON

s/ Jorin G. Rubin (with consent)
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*Counsel for Stephen Jankowski,
Individually, and as Authorized
Representative of Maple Garden
Associates, LLC*

Date: _____

/s/ Jessica A. Nathan
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Dated: July 14, 2025

/s/Stephen Jankowski (with consent)
STEPHEN JANKOWSKI

Date: July 14, 2025

/s/Stephen Jankowski (with consent)
Stephen Jankowski, Authorized
Representative of Maple Gardens, LLC

Date: July 14, 2025